

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LAWRENCE OBSTFELD,
individually and derivatively
on behalf of TOEV MEDICAL
CORPORATION, and
IGNITION VENTURES, INC.,

Plaintiffs,

v.

ARTHUR SCHWARTZ,
RONALD SOLAR,
RENAISSANCE BIOMEDICAL, INC.,
GLEN LIEBER, and
THERMOPEUTIX, INC.,

Defendants.

Civ. No. 07-5847 (DAB)

ECF Case

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants Ronald Solar, Renaissance Biomedical, Inc., Glen Lieber, and ThermopectiX, Inc.'s Motion to Dismiss, and the accompanying Declaration of Glen Lieber in support thereof, Defendants Ronald Solar, Renaissance Biomedical, Inc., Glen Lieber, and ThermopectiX, Inc. (the "Moving Defendants"), by their undersigned counsel, hereby move this Court, located at 500 Pearl Street, New York, New York, for an Order pursuant to Fed. R. Civ. P. 12(b)(1), 12(b)(2), 12(b)(6) and 23.1 dismissing

Plaintiffs' Amended Complaint with prejudice and in its entirety.

The Moving Defendants respectfully request oral argument on this motion.

Dated: August 24, 2007
New York, New York

CONSTANTINE CANNON LLP

By: s/ Kerin E. Coughlin
Kerin E. Coughlin
Stacey Anne Mahoney
450 Lexington Avenue, 17th Floor
New York, New York 10017
Phone: (212) 350-2700
Fax: (212) 350-2701
kcoughlin@constantinecannon.com

FREDRIKSON & BYRON, P.A.

Laurie J. Miller (*pro hac vice* pending)
200 Sixth Street, Suite 4000
Minneapolis, Minnesota 55402
Phone: (612) 492-7000
Fax: (612) 492-7077
lmiller@fredlaw.com

*Attorneys for Defendants Ronald Solar,
Renaissance Biomedical, Inc., Glen Lieber
and ThermopeutiX, Inc.*